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11 UNITED STATES BANKRUPTCY COURT

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13 DISTRICT OF NEVADA

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In re:

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16 USA Commercial Mortgage Company,

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Debtor.

Chapter 11

Case No.: 06-10725-GWZ

***Ex Parte Motion For Order Shortening Time For Hearing On Motion For An Interim Order Extending Termination Of USACM Liquidating Trust***

Date: OST Requested

Time: OST Requested

Place: Courtroom #1, Fifth Floor,  
 Clifton Young Courthouse, 300 Booth St.

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The USACM Liquidating Trust (the “Trust”), moves this Court for an order pursuant to Bankruptcy Rule 9006 and Local Bankruptcy Rule 9006 shortening the time for hearing the Motion For An Interim Order Extending Termination Of USACM Liquidating Trust (the “Bridge Motion”). This motion is supported by the following memorandum, and the declaration of Geoffrey L. Berman filed with this motion.

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**Memorandum**

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By the Bridge Motion, Geoffrey L. Berman, trustee of the Trust, asks the Court to extend the Trust for 120 days after the scheduled March 15, 2016 expiration of the Trust. This interim extension will permit this Court’s consideration of the Trust’s motion for authority to make the final distribution to creditors, abandon unadministered assets, discharge the Trustee, and thereafter terminate the Trust. A hearing on that motion is scheduled for March 22, 2016.

Absent a bridge order, the Trust will expire on March 15, 2016.

*Authority.* Bankruptcy Rules 9006(c)(1) and (d) authorize a court to reduce the time for a hearing, and a party to file an ex parte motion to shorten the time for a hearing. Bankruptcy Rule 9006(c)(1) provides in relevant part:

**In General.** Except as provided in paragraph (2) of this subdivision, when an act is required or allowed to be done at or within a specified time by these rules or by a notice given thereunder or by order of court, the court for cause shown may in its discretion with or without motion or notice order the period reduced.

Fed. R. Bankr. P. 9006(c)(1). Local Rule 9006 further authorizes an order shortening time for hearing upon compliance with its provisions.

*Counsel Has Conferred With the Notice Parties.* Prior to filing the Motion and pursuant to Local Rule 9006, counsel consulted the parties as shown on the Attorney Information Sheet for Proposed Order Shortening Time, filed concurrently herewith and incorporated by reference herein.

## **Request For Relief**

The Trustee asks this Court to schedule the hearing on the Bridge Motion prior to March 15, 2016.

DATED this 19th day of February, 2016.

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